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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22 vs.  
23 **DECLARATION OF FELIPE  
24 CORREDOR IN SUPPORT OF  
25 PLAINTIFF WAYMO LLC'S  
26 ADMINISTRATIVE MOTION TO FILE  
27 UNDER SEAL PORTIONS OF JOINT  
28 PRETRIAL FILINGS**

29 UBER TECHNOLOGIES, INC.;  
30 OTTOMOTTO LLC; OTTO TRUCKING  
31 LLC,

32 Defendants.

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1 I, Felipe Corredor, declare as follows:

2       1. I am an attorney licensed to practice in the State of California and am admitted to  
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6       I make this declaration in support of Waymo’s Administrative Motion to File Under Seal  
 7 Portions of Joint Pretrial Filings, filed concurrently herewith (the “Administrative Motion”). The  
 8 Administrative Motion seeks an order sealing the following materials filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Joint Proposed Pretrial Order	Highlighted Portions	Waymo (green highlighting)
Appendix A to Joint Proposed Pretrial Order	Entire Document	Waymo; Defendants
Appendix B to Joint Proposed Pretrial Order	Highlighted Portions	Anthony Levandowski and/or other third parties (red highlighting)
Appendix D to Joint Proposed Pretrial Order	Highlighted Portions	Waymo (green highlighting); Defendants (blue highlighting)
Uber’s Proposed Special Verdict Form	Highlighted Portions	Waymo (green highlighting)
Otto Trucking’s Proposed Special Verdict Form	Highlighted Portions	Waymo (green highlighting)
Joint Proposed Jury Instructions	Highlighted Portions	Anthony Levandowski (red highlighting)

21       2. Specifically, the green highlighted portions of the Joint Proposed Pretrial Order,  
 22 Appendix D thereto, Uber’s Proposed Special Verdict Form, and Otto Trucking’s Proposed Special  
 23 Verdict Form, as well as the entirety of Appendix A to Joint Proposed Pretrial Order, contain or refer  
 24 to trade secret and/or confidential business information, which Waymo seeks to seal.

25       3. The green highlighted portions of the Joint Proposed Pretrial Order, Uber’s Proposed  
 26 Special Verdict Form, and Otto Trucking’s Proposed Special Verdict Form, as well as the entirety of  
 27 Appendix A to Joint Proposed Pretrial Order contain, reference, and/or describe Waymo’s trade  
 28 secrets. The information Waymo seeks to seal includes the confidential design and functionality of

1 Waymo's proprietary autonomous vehicle system, including its LiDAR designs, which Waymo  
 2 maintains as secret. I understand that these trade secrets are maintained as secret by Waymo (Dkt. 25-  
 3 47) and that the trade secrets are valuable to Waymo's business (Dkt. 25-31). The public disclosure of  
 4 this information would give Waymo's competitors access to descriptions of the functionality or  
 5 features of Waymo's autonomous vehicle system. If such information were made public, I understand  
 6 that Waymo's competitive standing would be significantly harmed. Appendix A to Joint Proposed  
 7 Pretrial Order further contains, references, and/or describes Waymo's highly confidential and sensitive  
 8 business information. The information Waymo seeks to seal regards confidential details regarding  
 9 Waymo's business and competition. I understand that this confidential business information is  
 10 maintained by Waymo as secret. The public disclosure of this information would give Waymo's  
 11 competitors access to Waymo's business strategy for its autonomous vehicle system. If such  
 12 information were made public, I understand that Waymo's competitive standing would be  
 13 significantly harmed.

14       4. In addition, the green highlighted portions of Appendix D to the Joint Proposed Pretrial  
 15 Order contain addresses of former Waymo employees involved in this case, the disclosure of which  
 16 would cause Waymo and those employees substantial harm due to the high public profile of this  
 17 litigation.

18       5. Waymo's request to seal is narrowly tailored to those portions of the Joint Proposed  
 19 Pretrial Order, Appendices A and D to Joint Proposed Pretrial Order, Uber's Proposed Special Verdict  
 20 Form, and Otto Trucking's Proposed Special Verdict Form that merit sealing.

21       6. Waymo also seeks to seal the portions of Appendices A, B, and D to Joint Proposed  
 22 Pretrial Order and the Joint Proposed Jury Instructions identified in the table above because Waymo  
 23 believes such information is considered confidential or non-public by Defendants and/or certain third  
 24 parties.

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1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on September 21, 2017.

4 By /s/ Felipe Corredor  
5 Felipe Corredor  
6 Attorneys for WAYMO LLC  
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9 **SIGNATURE ATTESTATION**

10 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
11 filing of this document has been obtained from Felipe Corredor.

12 /s/ Charles K. Verhoeven  
13 Charles K. Verhoeven  
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